UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MISSOURI

EASTERN DIVISION

BOBBY MORRIS, individually and on behalf of all others similarly situated,
 	
      Plaintiff,
 	
v.
 	
OHMIUX LLC D/B/A CARBINOX,
 	
      Defendant.
	Case No. 4:25-cv-00663

UNOPPOSED MOTION TO EXTEND DEFENDANT OHMIUX LLC D/B/A CARBINOX'S DEADLINE TO RESPOND TO COMPLAINT

1.   This is a nationwide putative class action filed by Plaintiff Bobby Morris against Defendant Ohmiux LLC d/b/a Carbinox ("Carbinox") for alleged violations of the Telephone Consumer Protection Act. Carbinox was served with the summons and complaint in this action on May 12, 2025, and its responsive pleading deadline is currently June 2, 2025.

2.   The undersigned counsel for Carbinox was very recently engaged, and requires additional time to investigate Plaintiff's claims, explore the potential for early resolution with Plaintiff's counsel, assess Carbinox's responsive pleading options, and prepare Carbinox's responsive pleading.

3.   For these reasons, Carbinox respectfully requests that its deadline to respond to Plaintiff's complaint be extended by 30 days from June 2, 2025, to July 2, 2025.

4.   This motion is not being brought for the purpose of delay, and is the first extension of time requested by Carbinox.

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5.   The undersigned counsel for Carbinox has spoken with Plaintiff's counsel regarding this request for extension. Plaintiff's counsel does not oppose this request.

6.   For the foregoing reasons, Carbinox respectfully submits that good cause exists to grant the requested 30 day extension of Carbinox responsive pleading deadline, which would extend Carbinox's deadline from June 2, 2025 to July 2, 2025.

DATED: May 27, 2025   BUCHALTER
                                          A Professional Corporation

                                          By: ___/s/Artin Betpera_____
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                                               D/B/A CARBINOX

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